

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND)	
SOUTHWEST AREAS PENSION FUND,)	
and HOWARD McDOUGALL, trustee,)	
)	
v.)	Case No. 08 C 482
)	
Plaintiffs,)	Honorable
)	District Judge Kennelly
BLOM TRUCKING, INC.,)	
an Ohio corporation,)	
)	
Defendant.)	

MOTION FOR RULE TO SHOW CAUSE WHY
BLOM TRUCKING, INC. AND PAUL H. BLOM
SHOULD NOT BE HELD IN CONTEMPT

NOW COME the Plaintiffs, Central States, Southeast and Southwest Areas Pension Fund and Howard McDougall, trustee ("Pension Fund"), and respectfully request that this Court grant their Motion for Rule to Show Cause Why Defendant Blom Trucking, Inc. And Paul H. Blom Should Not Be Held In Contempt of Court. In support of this Motion, the Pension Fund states as follows:

1. On March 28, 2008, this Court entered a Judgment Order in the amount of \$537,766.06 ("Judgment") in favor of the Pension Fund and against Blom Trucking, Inc. ("Blom Trucking"). A true and correct copy of the Judgment is attached hereto as Exhibit A.

2. On May 1, 2008, the Clerk of the Court issued a Citation in Supplemental Proceedings to Discover Assets ("Citation"). The Citation was personally served upon Paul H. Blom, president of Blom Trucking. A true and accurate copy of the Citation is attached

hereto as Exhibit B. A true and accurate copy of the Return of Service of the Citation is attached hereto as Exhibit C.

3. The Citation directed Blom Trucking, through Paul H. Blom, to appear and give testimony as to Blom Trucking's assets, if any, available to satisfy the Judgment. In addition, Blom Trucking was required to produce certain documents, including financial statements, tax returns and bank statements for the period of January 2005 through present.

4. To date, Blom Trucking has failed to produce the documents outlined in the Citation. Furthermore, Mr. Blom failed to appear on June 10, 2008 for an examination as to assets Blom Trucking may have to satisfy the Pension Fund's Judgment.

WHEREFORE, the Pension Fund respectfully requests that this Motion be granted and that Blom Trucking, Inc. and Paul H. Blom be ordered to appear in Court on a date certain to show cause, if any exists, why they should not be held in contempt of Court.

Respectfully submitted,

/s/ Rebecca K. McMahon
Rebecca K. McMahon
Attorney for Plaintiffs
Central States, Southeast and Southwest
Areas Pension Fund
9377 West Higgins Road
Rosemont, Illinois 60018-4938
847/518-9800, Ext. 3441
ARDC #06290192

July 25, 2008

CERTIFICATE OF SERVICE

I, Rebecca K. McMahon, one of the attorneys for the Central States, Southeast and Southwest Areas Pension Fund and Howard McDougall, trustee, certify that on July 25, 2008, I caused the foregoing Motion for Rule to Show Cause Why Blom Trucking, Inc. And Paul H. Blom Should Not Be Held in Contempt to be filed electronically. I served the foregoing Motion and Notice of said Motion on July 25, 2008, via UPS Next Day Air to:

Paul H. Blom
1234 West Seymour Ave.
Cincinnati, Ohio 45202

Said documents were deposited in the United States Mail at 9377 West Higgins Road, Rosemont, Illinois, 60018-4938, with proper prepaid postage affixed thereto, this 25th day of July, 2008.

/s/ Rebecca K. McMahon
Rebecca K. McMahon
One of Central States' Attorneys